

1 SUSAN VINEYARD
301 East Oak Street
2 West Frankfort, Illinois 62896
618-932-3222 telephone
3 618-937-2405 facsimile
svcollect@aol.com

4
5 **ILLINOIS COMMERCE COMMISSION**
SPRINGFIELD, ILLINOIS

6 **SUSAN VINEYARD,**

7 **Complainant,**

8 **Vs.**

Docket # 04-0094

9 **CENTRAL ILLINOIS PUBLIC SERVICE**
10 **COMPANY, dba AmerenCIPS.**

11 **DECLARATION OF SUSAN VINEYARD**

12 NOW COMES SUSAN VINEYARD and makes her declaration of facts and
13 information in an attempt to rebuttal the PREPARED DIRECT TESTIMONY OF ROBIN
14 HADLEY FOR CENTRAL ILLINOIS PUBLIC SERVICE COMPANY, DBA
15 AMERENCIPS as follows:

- 16 1. The statements of ROBIN HADLEY are inaccurate, false and mis-leading
17 and are mendacious in nature..
- 18 2. Records indicate that SUSAN VINEYARD contacted AmerenCIPS on or
19 about May 15, 2002 to obtain energy services and spoke with ANDREA
20 GRAHAM and was required to produce proof of my social security number
21 and a picture ID, to which I responded immediately.
- 22 3. In addition, MS. GRAHAM informed me that my social security number was
23 associated with three other accounts, to which I immediately objected.
- 24 4. MS. GRAHAM informed me that I must pay these associated accounts or
25 amend my bankruptcy schedules to reflect those debts.
5. Records prove that VINEYARD amended her bankruptcy schedules to
include the three AmerenCIPS accounts and listed the three accounts as
disputed on the bankruptcy schedules.
6. VINEYARD sent the amended schedules to the United States Bankruptcy
Court in Oakland, California and a copy of the amended schedules to
AmerenCIPS in Pawnee, Illinois by UPS overnight and copies of those
airbills were attached to the VINEYARD PREPARED DIRECT
TESTIMONY.
7. HADLEY contends that VINEYARD'S service was disconnected in
September 2003 because they received information that fraudulent activity
was involved on this account.
8. It is absolutely true that I was living at 301 East Oak Street in September
2003.

OFFICIAL FILE

04-0094
Vineyard 2.0

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- 1 9. AmerenCIPS objected to VINEYARD knowing the identity of the informant,
2 but on the other hand tries to paint a tainted picture of VINEYARD's
3 integrity, by hailing this informant as important to AmerenCIPS fraud
4 detection when in fact AmerenCIPS had approved VINEYARD'S
5 application for energy services on or about May 15, 2002, but failed to
6 place the service in VINEYARD'S name.
- 7 10. VINEYARD was in California for the last two weeks in August and the first
8 three weeks of September 2003 and had her mail on hold at the local Post
9 Office.
- 10 11. When VINEYARD returned to 301 East Oak Street, VINEYARD picked up
11 her mail at the Post Office and declares under the penalty of perjury that
12 there was no notice from AmerenCIPS regarding suspected fraudulent
13 activity.
- 14 12. THERE WAS NO FRAUD AT 301 EAST Oak Street involving energy
15 services and no notices were sent by AmerenCIPS.
- 16 13. AmerenCIPS has not produced any copy of a notice regarding fraudulent
17 activity.
- 18 14. VINEYARD has agreed to accept all charges at 301 East Oak Street since
19 May 15, 2002, the date in which VINEYARD applied for service and was
20 approved.
- 21 15. It is true that AmerenCIPS billed 703 East Oak Street # D as residential
22 service when it was non-residential.
- 23 16. The fact that AmerenCIPS mis-classified the service does not change the
24 fact that they breached Illinois Administrative code section 280.50(c).
- 25 17. On or about April 15, 2002, MANSOR SHOKOHI was removed as Trustee
or TOSCANO LAND TRUST.
18. On or about April 15, 2002, WESTPORT OVERSEAS, S.A.de C.V., a
Mexican corporation was appointed successor Trustee of Toscano Land
Trust.
19. SUSAN VINEYARD is the President of WESTPORT OVERSEAS, S.A. de
C.V., a Mexican corporation and signed the voluntary bankruptcy petition of
TOSCANO LAND TRUST on or about February 7, 2003 in her capacity as
President of WESTPORT.
20. MANSOR SHOKOHI purchased 703 East Oak Street, which is 3
apartments that are known as Units A, B & C, on or about June 30, 1995.
Unit D was established on August 9, 1995 as the house meter for common
areas where electricity was needed.
21. Apparently, from the records produced by AmerenCIPS, the monthly bills
were in the neighborhood of \$ 15.00 to \$16.00 per month. That appears to
be approximately 215 consecutive months that AmerenCIPS allowed
electric services to be provided to 703 East Oak # D without ever contacting
SUSAN VINEYARD. If they believed she was the responsible party.
22. According to Exhibit "I", they had the correct telephone number of 618-932-
3222 for SUSAN VINEYARD.
23. On Page 10, line items 181 to 209, AmerenCIPS claims that SUSAN
VINEYARD and SANGIOVESE LAND TRUST opened the energy services
account at 301 East Oak Street on December 12, 1991.
24. In February 1998, the formation of SANGIOVESE LAND TRUST was
25 contemplated. SLT did not exist in 1991. SLT was never formed as an
Illinois Land Trust.

- 1 25. Exhibit "L" is a copy of a Direct Deposit Form in the name of S & V
2 PROPERTY MMANAGEMENT COMPANY, INC., authorizing CIPS to take
3 money from SANGIOVESE LAND TRUST account at First Bank, and is
4 signed by BARBARA WILLIAMS.
- 5 26. There is no S & V PROPERTY MANAGEMENT COMPANY, INC. SUSAN
6 VINEYARD was a partner with MANSOR SHOKOHI in S & V PROPERTY
7 MANAGEMENT COMPANY, an Illinois general partnership.
- 8 27. BARBARA WILLIAMS did not have signatory authority on any bank account
9 of SUSAN VINEYARD or MANSOR SHOKOHI and certainly was not
10 authorized to sign any direct debit forms.
- 11 28. BARBARA WILLIAMS was my house keeper, had keys to my house and
12 knowledge of my social security number and that of MANSOR SHOKOHI.
- 13 29. This is just another example how CIPS does not verify who has authority to
14 open accounts or sign direct debit forms.
- 15 30. On page 12, AmerenCIPS states that Christine Susan Vineyard opened a
16 residential service account on April 2, 2001. That is impossible, because
17 SUSAN VINEYARD was living at 486 Vasser Avenue in Berkeley
18 California at that time. See AmerenCIPS Exhibit "M" and answer to
19 Question 5.
- 20 31. On page 12, lines 235 to 238, AmerenCIPS accuses SUSAN VINEYARD
21 of using various social security numbers and permutations of her name to
22 obtain electrical service from AmerenCIPS. This is false and AmerenCIPS
23 has not produced one document that can stand behind their allegations.

24 SUMMARY

- 25 32. AmerenCIPS violated Illinois Administrative Code Section 280.50 c) by mis-
classifying the electrical service at 703 #D East Oak Street as residential
when it is clearly non-residential and can not be transferred to the
residential account of SUSAN VINEYARD at 301 East Oak Street.
33. AmerenCIPS violated Illinois Administrative Code Section 280.50 d) when it
failed to get proper identification from TOSCANO LAND TRUST,
SANGIOVESE LAND TRUST, CATHERINE S VINEYARD and CHRISTINE
S VINEYARD or my authority for these entities and individuals to obtain
energy services.
34. SUSAN VINEYARD has agreed to accept the energy services bill of
CATHERINE S VINEYARD from May 15, 2002 until the change of services
into the name of SUSAN VINEYARD in September , 2003, which was \$
662.00 less the payment of \$ 121.00 to retore the improperly disconnected
service. I admit that I used energy services in the name of CATHERINE S
VINEYARD from May 15, 2002 to September 2003, notwithstanding that I
had provided proper identification, amended my bankruptcy schedule per
AmerenCIPS employee ANDREA GRAHAM and had been approved for
energy services in my name—SUSAN VINEYARD, NOTWITHSTANDING
AmerenCIPS failure to transfer the services.

I declare under the penalty of perjury that the foregoing statements are true and
accurate and can testify if called as a witness to do so.

SUSAN VINEYARD
September 14, 2004

Ameren.robinhadley.sv.doc

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